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ABSTRACT

This document comprises a report on international progress to close the "wage gap", the differential between the earnings of women and men. Information was gathered on pay equity activities from a survey of government agencies, trade unions, women's organizations, and international bodies. Almost all of the jurisdictions surveyed have addressed the issue of "equal pay for equal work" through both anti-discrimination and equal pay laws. However, not all countries address the undervaluing of female-dominated jobs, "equal pay for work of equal value," even though the issue has been addressed by the International Labor Organization (ILO) and the European Economic Community. Ontario, Canada, currently leads the world in unprecedented legislation enacted in 1987 to require pay equity implementation in both public and private sectors. The wage gap for the following countries is reported: (1) Australia; (2) Belgium; (3) Brazil; (4) Canada and the provinces of Alberta, British Columbia, Manitoba, New Brunswick, Newfoundland, Nova Scotia, Ontario, Prince Edward Island, Quebec, Saskatchewan, and the Yukon Territory; (5) Costa Rica; (6) Cyprus; (7) Czechoslovakia; (8) Denmark; (9) El Salvador; (10) the Federal Republic of Germany; (11) Finland; (12) France; (13) Greece; (14) Iceland; (15) the Republic of Ireland; (16) Northern Ireland; (17) Italy; (18) Korea; (19) Luxembourg; (20) the Netherlands; (21) New Zealand; (22) Norway; (23) the Soviet Union; (24) Sweden; (25) the United Kingdom; and (26) the United States. Statistical data are included on four graphs. A list of 10 references and a brief description of the National Committee on Pay Equity are appended. (FMW)

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National Committee on Pay Equity

Closing the Wage Gap

AN INTERNATIONAL PERSPECTIVE

In an effort to determine progress being made in other nations working to close the wage gap (the differential between the earnings of women and men), the National Committee on Pay Equity conducted a survey of international pay equity activities by contacting governments, trade unions, women's organizations, international bodies and others for insight into their policies, programs and experiences.

We hope that our initial exploration helps to establish an international network through which those interested in pay equity in the United States can exchange ideas with advocates working to achieve pay equity in other countries.

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YWCA of the USA, National Board

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Equal Pay for Work of Equal Value

Almost all of the jurisdictions covered in this report have, like the United States, established both anti-discrimination and equal pay laws. In most countries, however, the effect of these laws on the wage gap has been negligible, largely because of the deeply sex-segregated nature of the workforce and the inadequacy of these laws, and/or the enforcement of them, in addressing the factors affecting the undervalued status of women's work.

Anti-discrimination laws assist women entering the workforce, especially in non-traditional employment areas. The establishment of recruitment, hiring and promotion policies, the creation of training, educational and career advancement opportunities and the elimination of discriminatory terms and conditions of employment have positively affected women's situation in the workforce, but these provisions are only part of the solution to closing the wage gap.

Laws requiring equal pay for equal work ensure that women who are doing work identical to men who hold the same job are being paid the same and prevent employers from setting different rates for men and women workers. While equal pay laws are a necessary component of any policy addressing the wage gap, they do not remedy the undervalued status of women's work, which is segregated into low wage occupations.

A policy that addresses the undervaluing of female-dominated jobs is **pay equity**, or comparable worth, or **equal pay for work of equal value**, as it is known in most other nations. While the extent to which **equal pay for work of equal value** is recognized by laws in each of the jurisdictions examined in this report varies, its increasing prevalence is clear.

Equal pay for work of equal value laws directly address pay inequities between men and women by permitting an examination of different jobs, not just identical or similar jobs. Allowing comparison of different jobs is important because most women work in female-dominated occupations, or occupations where more than 70 percent of the workers are women, not in the same job classifications as men. A comparison between the skill, effort, responsibility and working conditions involved in female-dominated occupations, evaluated on the same basis as the skill, effort, responsibility and working conditions involved in male-dominated occupations, provides a clearer determination of which jobs are of equal value.

EQUAL PAY FOR EQUAL WORK

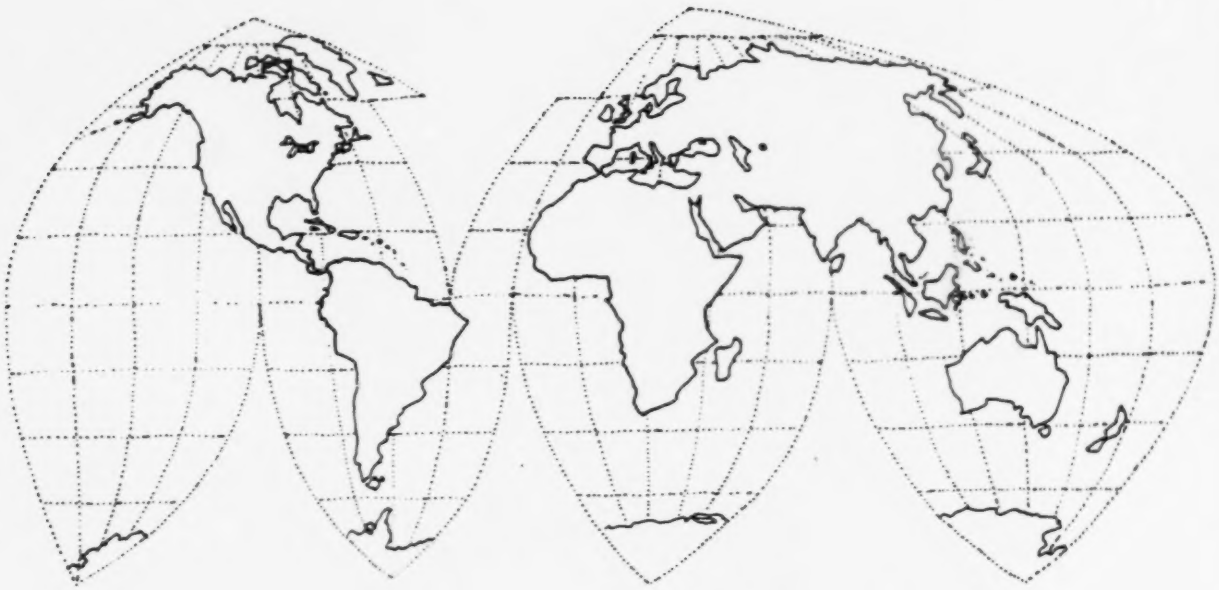
Equal pay for equal work means that men and women are paid the same for doing the same job.

Examples: *A male police officer and female police officer, or a male truck driver and a female truck driver performing the same duties for the same employer are required to receive the same wages.*

EQUAL PAY FOR WORK OF EQUAL VALUE

Equal pay for work of equal value means that male-and female-dominated jobs of equal value are paid the same. The total value for jobs can be determined by looking at consistent criteria such as skill, effort, responsibility and working conditions.

Examples: *In the state of Minnesota in the U.S., the total value for typing pool supervisor (a female-dominated job) was rated as equal to radio communications supervisor (a male-dominated job). Also in Minnesota, automotive parts technician (a male-dominated job) was rated as equal to dining hall coordinator (a female-dominated job).*



The View From Here

Among the primary factors leading to a country's attention to legislation establishing **equal pay for work of equal value** are the existence of a wage gap for women, which, worldwide, averages between 60 and 80 percent of men's earnings, and of occupational segregation. Varying socio-economic factors, legal and labor relations frameworks establish the approach a country may take to incorporate the principle. Since the root problems behind the wage gap are the same in most cases, experiences of other countries working toward a solution are instructive. The countries profiled in this report that are actively implementing pay equity provide case studies on the means for implementation necessary to close the wage gap.

The ILO and the EEC Set the Pace

Many nations have yet to incorporate the concept of **equal pay for work of equal value** into their laws promoting equality between men and women. However, **equal pay for work of equal value** has been included in the International Labor Organization's (ILO) Convention No. 100 on Equal Remuneration for Men and Women Workers since 1951. **Equal pay for work of equal value** was included in the European Economic Community's (EEC) Article 119 of 1957 and its Equal Pay Directive of 1975, No. 117. Since ILO Convention No. 100 was first ratified, the scope and definition of "equal value" has been examined and debated. Until the 1970's, Convention No. 100 was narrowly interpreted to mean equal pay for equal work. The confusion surrounding the Convention and the EEC's examination of the issue since its own Article 119 was established in 1957 were two factors that lead to the issuing of Equal Pay Directive No. 117 in 1975. Concerned about correcting more indirect discrimination than "equal pay for equal work" was able to address, the EEC broadened the scope and clarified the definition of equal value. The EEC directive, in particular, has given impetus to Member States to incorporate **equal pay for work of equal value** into their national legal frameworks. *(See page 6 for more information about the ILO and page 8 for information about the EEC and the Equal Pay Directive.)* While **equal pay for work of equal value** developments are relatively recent, the experiences of Member States, along with those of several other countries and jurisdictions, provide insight into how the principle has been practiced by nations seeking to close the wage gap.

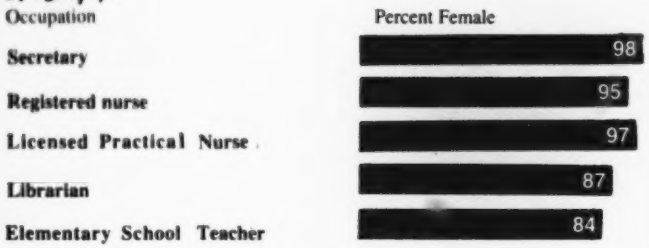
Ontario, Canada, Leads the Way

One jurisdiction that has benefitted from the experiences of other nations that have established **equal pay for work of equal value** laws is the Canadian province of Ontario. Ontario has applied many of the lessons taught by other nations implementing pay equity, and is clearly leading the world in efforts to close the portion of its wage gap that is attributable to sex-based wage discrimination. The pro-active legislation it enacted in 1987 to require pay equity implementation in both public and private sectors is unprecedented. As Ontario's policy is carried out, it will provide those interested in pay equity with many new insights into the means for achieving it. *(See page 11 for details on Ontario's legislation.)*

The Occupational Ghetto: IT'S UNIVERSAL

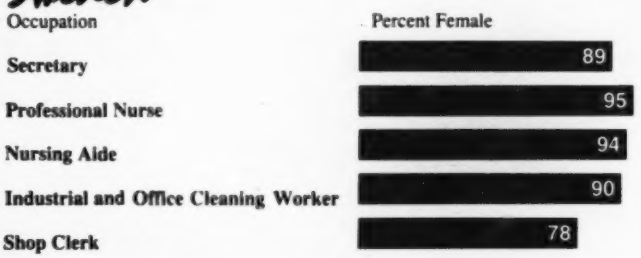
Whether women work as electronics assemblers in a Mexican *maquiladora*, as secretaries in the United Kingdom, or as nurses in the U.S., their work, which requires skills ranging from speed, accuracy and dexterity to working with people, is segregated from occupations dominated by men. *(Female-dominated occupations are designated as those where 70 percent or more workers are women.)*

U.S.A.



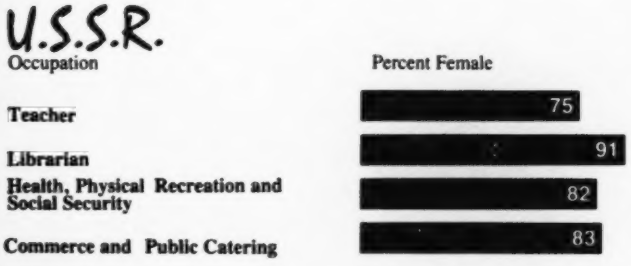
Half of all year-round, full-time female workers were in just 19 out of the possible 503 occupations that were classified in the 1980 Census.

Sweden

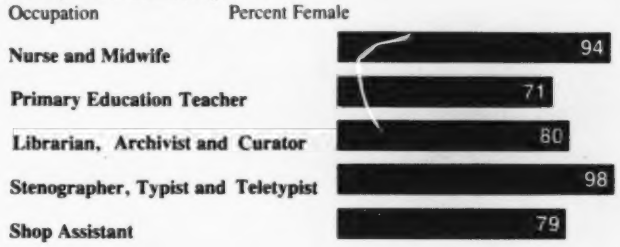


Women constitute more than 60 percent in 56 occupations while men do the same in 161 out of the more than 200 occupational fields specified in Sweden's 1980 Census.

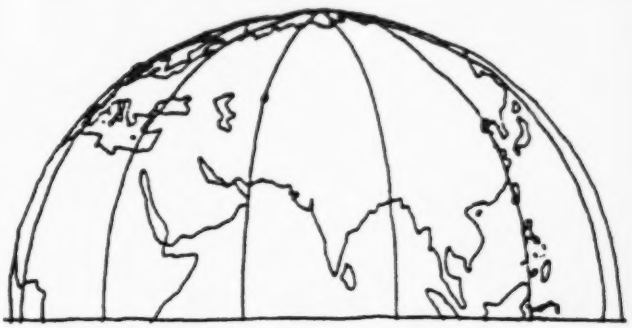
U.S.S.R.



New Zealand



Over three-quarters of female white-collar workers are employed in female-dominated occupations. *(An occupation is considered female-dominated if it is over 70 percent female.)*



Other Countries

Examples of jobs typically done by women:

- **Mexico — garment industry, electronics assembly**
- **Nicaragua — coffee picking**
- **Ethiopia — coffee bean cleaning**
- **Mozambique — cashew processing**

A recent survey in Singapore showed that women account for 87 percent of the total labor force in a typical electronics plant, 3 percent of the supervisors, 5 percent of the technicians and 5 percent of the white-collar workers.

International Labor Organization

The International Labor Organization, a specialized United Nations agency based in Geneva, Switzerland, adopted the following convention in 1951. Presently, 107 governments have ratified the convention. *(See list on page 7.)*

CONVENTION NO. 100, 1951

Convention Concerning Equal Remuneration For Men And Women Workers For Work Of Equal Value

Date of entry into force: May 23, 1953

Article 1

For the purpose of this Convention —

(a) the term "remuneration" includes the ordinary, the basic or minimum wage or salary and any additional emoluments whatsoever payable directly or indirectly, whether in cash or in kind, by the employer to the worker and arising out of the worker's employment;

(b) the term "equal remuneration for men and women workers for work of equal value" refers to rates of remuneration established without discrimination based on sex.

Article 2

1. Each Member shall, by means appropriate to the methods in operation for determining rates of remuneration, promote and, in so far as is consistent with such methods, ensure the application to all workers of the principle of equal remuneration for men and women workers for work of equal value.

2. The principle may be applied by means of —

(a) national laws or regulations;

(b) legally established or recognized machinery for wage determination;

(c) collective agreements between employers and workers; or

(d) a combination of these various means.

Article 3

1. Where such action will assist in giving effect to the provisions of this Convention measures shall be taken to promote objective appraisal of jobs on the basis of the work to be performed.

2. The methods to be followed in this appraisal may be decided upon by the authorities responsible for the determination of rates or remuneration, or, where such rates are determined by collective agreements, by the parties thereto.

3. Differential rates between workers which correspond, without regard to sex, to differences, as determined by such objective appraisal, in the work to be performed shall not be considered as being contrary to the principle of equal remuneration for men and women workers for work of equal value.

Article 4

Each Member shall co-operate as appropriate with the employers' and workers' organizations concerned for the purpose of giving effect to the provision of this Convention.

Articles 5, 6 and 9-14: Standard final provisions.

Articles 7 and 8: Declarations of application to non-metropolitan territories.

Convention No. 100

EQUAL REMUNERATION, 1951 TOTAL RATIFICATIONS: 107

COUNTRY	DATE OF RATIFICATION
AFGHANISTAN	1969
ALGERIA	1962
ANGOLA	1976
ARGENTINA	1956
AUSTRALIA	1974
AUSTRIA	1953
BAHAMAS	1976
BELGIUM	1952
BENIN	1968
BOLIVIA	1973
BRAZIL	1957
BULGARIA	1955
BURKINA FASO	1969
BYELORUSSIAN SSR	1956
CAMEROON	1970
CENTRAL AFRICAN REPUBLIC	1964
CHAD	1966
CHILE	1971
CHINA	1955
COLOMBIA	1963
COMOROS	1978
COSTA RICA	1960
COTE D'IVOIRE REPUBLIC OF	1961
CUBA	1954
CZECHOSLOVAKIA	1957
DENMARK	1960
DJIBOUTI	1978
DOMINICA	1983
DOMINICAN REPUBLIC	1953
ECUADOR	1957
EGYPT	1960
EQUATORIAL GUINEA	1985
FINLAND	1963
FRANCE	1953
GABON	1961
GERMAN DEMOCRATIC REPUBLIC	1975
GERMANY, FEDERAL REPUBLIC OF	1956

COUNTRY	DATE OF RATIFICATION
GHANA	1968
GREECE	1975
GUATAMELA	1961
GUINEA	1966
GUINEA-BISSAU	1977
GUYANA	1975
HAITI	1958
HONDURAS	1956
HUNGARY	1956
ICELAND	1958
INDIA	1958
INDONESIA	1958
IRAN,ISLAMIC REPUBLIC OF	1972
IRAQ	1963
IRELAND	1974
ISRAEL	1965
ITALY	1956
IVORY COAST	1961
JAMAICA	1975
JAPAN	1967
JORDAN	1966
LEBANON	1977
LIBYAN ARAB JAMAHIRIYA	1962
LUXEMBOURG	1967
MADAGASCAR	1962
MALAWI	1965
MALI	1968
MEXICO	1952
MONGOLIA	1969
MOROCCO	1979
MOZAMBIQUE	1977
NEPAL	1976
NETHERLANDS	1971
NEW ZEALAND	1983
NICARAGUA	1967
NIGER	1966
NIGERIA	1974
NORWAY	1959
PANAMA	1958

COUNTRY	DATE OF RATIFICATION
PARAGUAY	1964
PERU	1960
PHILIPPINES	1953
POLAND	1954
PORTUGAL	1967
ROMANIA	1957
RWANDA	1980
SAINT LUCIA	1983
SAN MARINO	1985
SAO TOME AND PRINCIPE	1982
SAUDI ARABIA	1978
SENEGAL	1962
SIERRA LEONE	1968
SPAIN	1967
SUDAN	1970
SWAZILAND	1981
SWEDEN	1962
SWITZERLAND	1972
SYRIAN ARAB REPUBLIC	1957
TOGO	1983
TUNISIA	1968
TURKEY	1967
UKRAINIAN SSR	1956
USSR	1956
UNITED KINGDOM	1971
VENEZUELA	1982
YEMEN	1976
YUGOSLAVIA	1952
ZAIRE	1969
ZAMBIA	1972

European Economic Community

Article 119 of the Treaty Establishing the European Economic Community (1957) recommended application of equal pay for equal work. The Equal Pay Directive (1975) provided for the application of **equal pay for work of equal value**.

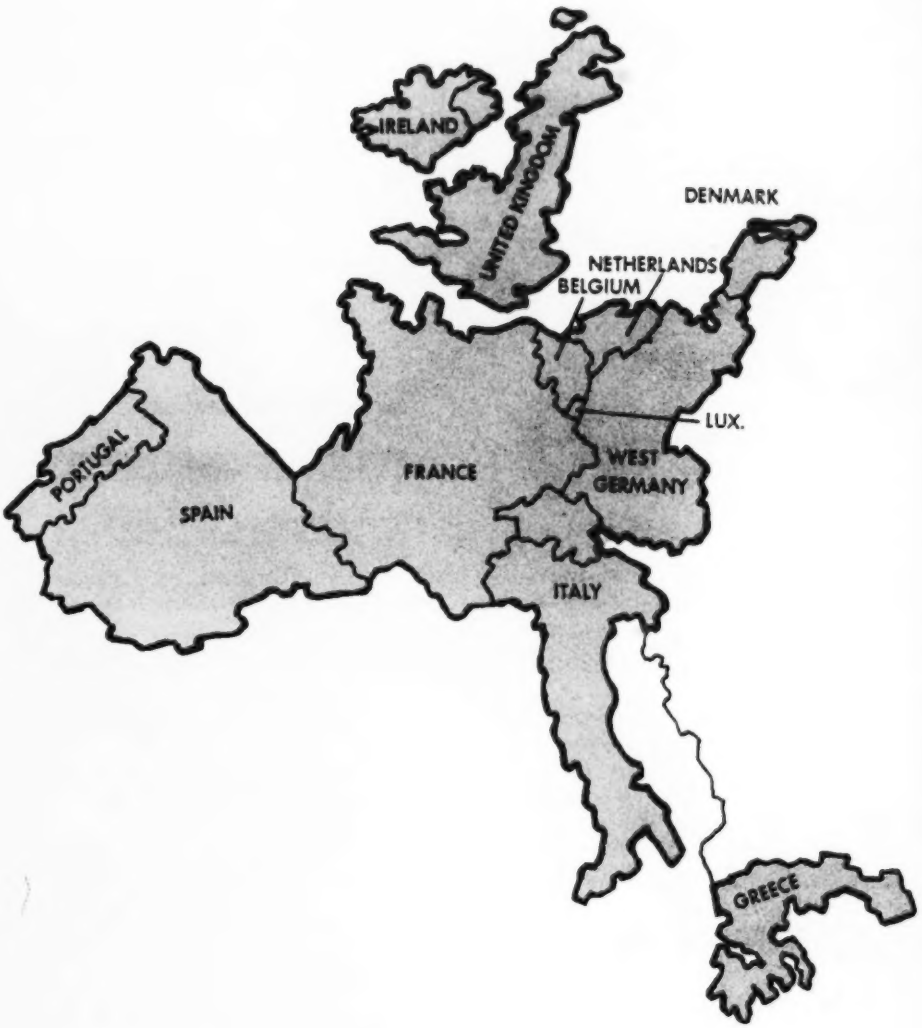
The European Economic Community (EEC) consists of twelve Member States — Belgium, the Federal Republic of Germany, Denmark, Greece, Spain, France, Ireland, Italy, Luxemborg, the Netherlands, Portugal and the United Kingdom — who are bound to observe Community provisions for equal pay and **equal pay for work of equal value**.

Under a directive, such as the Equal Pay Directive, Members States choose the method most suitable for complying with the Community law that the directive creates, whether through laws, regulations, decrees, orders, etc.

If the Commission believes a Member State is not in compliance with the directive, or if an individual citizen files a complaint, the Commission will remind the Member State in writing of its obligation and seek a reply from the Member State on its non-compliance.

Member States not replying are given another opportunity to take the steps necessary to implement the Commission's recommendations for coming into compliance. Failure to do so results in a referral to the Court of Justice.

To date, a number of cases have been made against Member States for failure to include **equal pay for work of equal value** in their national legislation, or for other infringements related to implementation of the Equal Pay Directive. As a result of Court decisions, both Denmark and the United Kingdom were required to change their laws to effectively include **equal pay for work of equal value**.



Equal Pay Directive, 1975 *

Article 1

The principle of equal pay for men and women outlined in Article 119 of the Treaty, hereinafter called 'principle of equal pay' means for the same work or for work to which equal value is attributed the elimination of all discrimination on grounds of sex with regard to all aspects and conditions of remuneration.

In particular, where a job classification system is used for determining pay, it must be based on the same criteria for both men and women and so drawn up as to exclude any discrimination on grounds of sex.

Article 2

Member States shall introduce into their national legal systems such measures as are necessary to enable all employees who consider themselves wronged by failure to apply the principle of equal pay to pursue their claims by judicial process after possible recourse to other competent authorities.

Article 3

Member States shall abolish all discrimination between men and women arising from laws, regulations or administrative provisions which is contrary to the principle of equal pay.

Article 4

Member States shall take the necessary measures to ensure that provisions appearing in collective agreements, wage scales, wage agreements or individual contracts of employment which are contrary to the principle of equal pay shall be, or may be declared, null and void or may be amended.

Article 5

Member States shall take the necessary measures to protect employees against dismissal by the employer as a reaction to a complaint within the undertaking or to any legal proceedings aimed at enforcing compliance with the principle of equal pay.

Article 6

Member States shall, in accordance with their national circumstances and legal systems, take the measures necessary to ensure that the principal of equal pay is applied. They shall see that effective means are available to take care that this principle is observed.

Article 7

Member States shall take care that the provisions adopted pursuant to this Directive, together with the relevant provisions already in force, are brought to the attention of employees by all appropriate means, for example at their place of employment.

* There are ten articles in all, 75/117/EEC.

Other International Conventions

The United Nations Convention on the Elimination of All Forms of Discrimination Against Women is a comprehensive convention with a broad framework of principles and provisions for achieving social, economic and political rights for women. Rights that it ensures include **equal pay for work of equal value**.

Since it entered into force in 1981, over 80 nations have ratified the convention, which, in principle, legally binds their governments to agree to its provisions and to take specific action to comply with them.

The U.S. has signed, but not ratified, the Convention.

Pay Equity — Selected Countries

Statistical Caution

The identification of precise differences when making international comparisons is difficult due to differences in each country's concepts and definitions, scopes and sources. While some data may cover adult workers, others may only include juveniles and apprentices. The degree of comparability increases when earnings of the same type can be considered, but gathering such data was difficult, since time intervals covered by the data varied.

Economic Sector Comparison

The wage gaps for some countries in this report are only available for certain economic sectors. The following breakdown is included to provide an understanding of the occupations that may be in each sector. Most wage gap data in the report is for earnings in non-agricultural activities.

Agriculture: agriculture, hunting, forestry and fishing

Industry: mining and quarrying, manufacturing, electricity, gas and water

Services: trade, restaurants and hotels, transport, storage, communications, finance and insurance, and public and private services

The Wage Gap

The wage gap equals women's earnings as a percentage of men's earnings. This is calculated by dividing women's wages by men's wages.

AUSTRALIA

ILO Convention No. 100 Ratification: 1974
Wage gap: 1970, 59.1%; 1976, 80.9%; 1986, 81.7%
(full-time, average weekly earnings)

In Australia, wages are largely determined by industrial tribunals established by either federal or state legislation. In 1972, the federal Conciliation and Arbitration Commission extended a previous decision requiring equal pay for equal work to include equal pay for work of equal value. The Commission stated that "award rates for all work should be considered without regard to the sex of the employee."

The Australian Council of Trade Unions (ACTU), seeking to strengthen the use of the Commission's equal pay for work of equal value ruling in wage setting introduced a test case in 1985. The Commission, however, narrowed the use of equal pay for work of equal value and limited its application to more narrowly defined comparisons.

While state and federal nurses have had some success in gaining pay increases under the 1972 decision in the past two years, further application, such as that sought by ACTU, has been limited.

BELGIUM

Member State, EEC
ILO Convention No. 100 Ratification: 1952
Wage gap: 1970, 66.7%; 1979, 69.7%; 1986, 73%
(average hourly earnings)

The Royal Decree of December 9, 1975 reinforced an existing national collective labor agreement. The agreement states, "Equal pay for men and women implies, for the same work or for work of equal value, the elimination of all discrimination based on sex."

According to EEC Commission reports, few cases on equal pay for work of equal value have ever been pursued under the agreement.

BRAZIL

ILO Convention No. 100 Ratification: 1957
Wage gap: 1970, 46%; 1980, 33%

CANADA

ILO Convention No. 100 Ratification: 1972
Wage gap: 1971, 60.4%; 1984, 65.5%; 1985, 64.9%; 1986, 66%

Section 11 of the Canadian Human Rights Act, in effect since 1978, requires equal pay for work of equal value. Administered by the Canadian Human Rights Commission (CHRC), the Act covers workers under federal jurisdiction, or approximately ten percent of the country's workforce. Section 11 stipulates that:

> It is a discriminatory practice for an employer to establish or maintain differences in wages between male and female employees employed in the same establishment who are performing work at equal value. In assessing the value of work performed by employees employed in the same establishment the criterion applied is the composite of the skill, effort and responsibility required in the performance of the work and the conditions under which the work is performed.

Section 11 is a complaint-driven provision. The CHRC investigates complaints it receives and negotiates settlements where non-compliance is discovered.

Also in 1978, the CHRA's pay equity provisions were incorporated in the Canadian Labour Code, enabling inspectors from Labour Canada to investigate or refer suspected wage discrimination cases to the CHRC.

Since the CHRA has been in effect, 24 cases, involving nearly 8,000 workers, have been awarded approximately $37 million, including back pay.

CANADIAN PROVINCES

ALBERTA

Wage gap: 1971, 60.3%; 1985, 60.3%
(year round, full-time earnings)

BRITISH COLUMBIA

Wage gap: 1985, 61.6%
(year round, full-time earnings)

MANITOBA

Wage gap: 1985, 68.2%
(year round, full-time earnings)

In 1985, Manitoba passed the Pay Equity Act, requiring public employers — the Manitoba Public Service, crown corporations, and external agencies that include 23 hospitals and 4 universities — to implement pay equity. The legislation, pro-active rather than complaint-driven because it mandates that public sector employers identify and eliminate sex-based wage discrimination through job evaluation, utilizes the collective bargaining process to reach implementation agreements.

A Pay Equity Bureau established by the Act monitors compliance and provides assistance to employers, workers and bargaining agents working to comply with the legislation.

The provincial government's largest union, the Manitoba Government Employees' Association, signed an agreement that will bring pay equity adjustments of up to $3.27 an hour to about 5,000 public service employees in female-dominated job classes. The joint government-and-union agreement, which will be phased in over a four-year period, was a result of two years of negotiations.

NEW BRUNSWICK

Wage gap: 1985, 64.4%
(year round, full-time earnings)

NEWFOUNDLAND

Wage gap: 1985, 70.7%
(year round; full-time earnings)

NOVA SCOTIA

Wage gap: 1985, 61.7%
(year round, full-time earnings)

In May 1988, Nova Scotia passed legislation to pro-actively phase-in pay equity. The province has planned a three-stage assessment, evaluation and negotiation process to implement its pay equity policy. The policy involves the adoption of a gender-neutral job evaluation system, implementation of the new system and pay equity adjustments.

The Nova Scotia Civil Service, which is the first category to be affected, began its assessment and evaluation stage on September 1, 1988 and must complete it in two years. Crown corporations and external agencies such as hospitals, school boards and universities are the second affected category and begin their process in September 1989.

Extension of the pay equity policy to the private sector, the last phase of Nova Scotia's plan, is expected to begin not later than the legislature's 1992 session, when legislation will be introduced.

ONTARIO

Wage gap: 1985, 62.9%
(year round, full-time earnings)

Passed in 1987, Ontario's Pay Equity Act is the only legislation in the world to pro-actively require implementation of pay equity in both public and private sectors. The legislation sets deadlines for employers to post pay equity plans in the workplace, depending upon the number of employees and the sector, and additional deadlines for beginning to make pay equity adjustments.

ONTARIO PAY EQUITY TIMETABLE

Employer	Posting	Wage Adjustments Begin
Public Sector	Jan. 1, 1990	Jan. 1, 1990
Private Sector with 500+ employees	Jan. 1, 1990	Jan. 1, 1991
Private Sector with 100-499 employees	Jan. 1, 1991	Jan. 1, 1992
Private Sector with 50-99 employees	Jan. 1, 1992*	Jan. 1, 1993
Private Sector with 10-49 employees	Jan. 1, 1993*	Jan. 1, 1994

* posting is voluntary for private sector employers with fewer than 100 employees

Employers' efforts to develop an individualized pay equity plan for their workplaces are entirely self-managed. Advice and assistance is provided by The Pay Equity Commission, which was established by the Act to develop educational materials, seminars and workshops designed to aid employers' compliance with the Act.

PRINCE EDWARD ISLAND

Wage gap: 1985, 73.4%
(year round, full-time earnings)

Presently awaiting proclamation, Prince Edward Island's equal pay for work of equal value legislation applies to the public sector. Employers are required to negotiate pay equity plans with unions. The negotiating process will begin for the civil service three months after proclamation; the other public agencies will begin fifteen months after proclamation.

QUEBEC

Wage gap: 1985, 68.2%
(year round, full-time earnings)

The first province to legislate for pay equity, Quebec included a provision for equal pay for work of equal value in its Human Rights Charter in 1975. The legislation requires public and private sector employers to pay equal salary or wages to employees who perform equivalent work at the same place or establishment.

It is a complaint-driven law under which only a few hundred workers have received pay equity adjustments. An examination of the cases indicates that few of them applied equal pay for work of equal value.

A contract compliance program was set up in 1987. Under the program, contractors and subcontractors with 100 or more employees who receive provincial contracts for $100,000 or more must obtain a certificate of approval for their pay equity plan from the Ministry of Supply and Services. Follow-up investigations are made to ensure each firm's compliance. Presently, a government committee is evaluating the contract compliance program; its report is due by the fall of 1989.

SASKATCHEWAN

Wage gap: 1985, 72.7%
(year round, full-time earnings)

YUKON TERRITORY

Equal pay for work of equal value provisions are included in the Yukon's Human Rights Act.

COSTA RICA

ILO Convention No. 100 Ratification: 1960
Wage gap: 1978, 86.3%; 1980, 81.5%

CYPRUS

Wage Gap: 1977, 49.6%; 1986, 56.1%

CZECHOSLOVAKIA

ILO Convention No. 100 Ratification: 1957
Wage gap: 1977, 67.4%; 1986, 67.9%

DENMARK

Member state, EEC
ILO Convention No. 100 Ratification: 1960
Wage gap: 1970, 72.4%; 1975, 83.2%; 1980, 84.5%; 1986, 82.2%
(average hourly earnings)

Law No. 32 of February 4, 1976, which reinforced existing collective agreements, was changed further in 1986 to include a provision for equal pay for work of equal value.

Since 1985, several suits have been filed by trade unions representing clerical workers and unions of all-female unskilled workers as a result of equal value campaigns.

EL SALVADOR

Wage gap: 1972, 73%; 1976, 84%; 1980, 77%

FEDERAL REPUBLIC OF GERMANY

Member state, EEC
ILO Convention No. 100 Ratification: 1956
Wage gap: 1970, 69.2%; 1982, 72.6%; 1986, 73%
(average hourly earnings)

Enacted in 1980, An Act Respecting Equality of Treatment for Men and Women at the Workplace states that, "No employment contract may establish lower levels of pay for one sex than the other for work which is the same or of equal value."

There are no mechanisms for monitoring employer compliance with the law.

FINLAND

ILO Convention No. 100 Ratification: 1963
Wage gap: 1970, 70.3%; 1975, 72.6%; 1980, 75.4%; 1982, 76.7%
(average hourly earnings)

Finland's Act on Equality between Women and Men, enacted in 1987, establishes an employer's actions as discriminatory if the employer "applies to an employee conditions of payment or employment less favorable than those he applies to an employee of the opposite sex employed by him in the same work or work of equal value."

Under the law, discrimination claims may be pursued in court.

The law authorizes an Equality Ombudsman to inspect workplaces for violations of the Act as well as provide education and assistance in the implementation of the law. The Ombudsman may also refer matters to the Equality Board, which oversees implementation of the Act and determines fines and penalties for noncompliance.

FRANCE

Member state, EEC
ILO Convention No. 100 Ratification: 1953
Wage gap: 1973, 78.8%; 1979, 79.2%; 1981, 80.4%; 1986, 82.2%
(average hourly earnings)

France enacted new legislation in 1983 prohibiting sex discrimination in many forms, including pay. The law defines equal value and requires employers to justify any differentials in pay. Under the law, individuals or trade unions on behalf of individuals may file pay equity claims.

Employers with at least 50 workers are required to develop equality plans with progress reports on each area of sex discrimination the employer is working to eliminate. The annual written reports, given to the government ministers responsible for women's rights and labour, are available to both trade unions and employees upon request.

One example of the effectiveness of the law's provision as it relates to pay equity was demonstrated by Sofinco Bank. The Bank's program, which included internal promotions and training guidelines, had steps to bring women's earnings to line with men's. Prior to the program, women earned between 10 and 38 percent less than men. Women's pay was adjusted in less than six months.

GREECE

Member state, EEC
ILO Convention No. 100 Ratification: 1975
Wage gap: 1980, 60.8%; 1981, 67.2%
(average hourly earnings, manufacturing)

ICELAND

ILO Convention No. 100 Ratification: 1958
Wage gap: 1980, 58%; 1985, 61.1%
(average annual full-time earnings)

The Equal Status and Equal Rights of Women and Men Act, enacted in 1985, states, "For the purpose of this Act 'equal remuneration to men and women for equally valuable and comparable work' refers to rates of remuneration established without any distinction on the basis of sex."

The Equal Status Council, founded in 1976, is the government institution responsible for monitoring compliance with the Act.

REPUBLIC OF IRELAND

Member state, EEC
ILO Convention No. 100 Ratification: 1974
Wage gap: 1970, 66.2%; 1975, 60.9%; 1981, 67.6%
(average hourly earnings, manufacturing)

The Employment Equality Act of 1977, which amended The Anti-discrimination Act (1974), gives women the right to equal pay for "like work." "Like work" is defined by three criteria: as "same work"; work that is of "similar nature"; or

work "equal in value." Comparisons can be made not only with a male job in the same workplace, but also the same city, town or locality, even if the work and working arrangements differ.

When a worker has established that she is doing like work without equal compensation, equality officers appointed to investigate claims make recommendations on the case to the Labour Court. The Labour Court can order compliance. Appeals may be made to the High Court on a point of law.

While the reasoning behind rulings made by the Labour Court are generally only for the claimants involved and not for public examination, it appears that utilizing factor comparison to determine "like work" in equal value cases has been established and can be relied upon. In *Waterford Glass v. Amalgamated Transport and General Workers*, the equality officer in the case ruled that the degree of skill, dexterity and concentration of the female workers was as demanding as, and therefore comparable to, the physical strength, endurance and working conditions of male workers.

NORTHERN IRELAND

Wage gap: 1974, 69.7%; 1977; 74.3%; 1984, 74.7%
(average gross hourly earnings)

The Equal Pay Act of 1970 was amended in 1984 to incorporate equal pay for work of equal value. Under the law, a woman may seek equal pay if she feels her job makes the same demands on her as a man's makes on him, i.e. in effort and skill, whether or not the jobs have been assessed by job evaluation. To settle a claim, claimants may work toward an agreement with an employer, or, further, may consult the Equal Opportunities Commission or the Labour Relations Agency for advice or counsel when taking a claim before an industrial tribunal.

ITALY

Member state, EEC
ILO Convention No. 100 Ratification: 1956
Wage gap: 1970, 74.2; 1975, 78.7; 1980, 83.2
(average hourly earnings, manufacturing)

The Italian Anti-discrimination Act, enacted in 1977, states that:

> Women workers shall have rights to the same pay as men when the work required is either equal or of equal value. Common criteria for men and women must be adopted in formulating grading and salary structures.

Equal value is further defined by Italy as "work having the same professional content, as normally evaluated by collective agreements or company practices, irrespective of group or individual productivity."

No agency exists to monitor compliance with the law. Complaints may be settled by conciliation, action by trade unions or litigation.

KOREA

Wage gap: 1977, 44.7%; 1986, 48.5%

LUXEMBORG

Member state, EEC
ILO Convention No. 100 Ratification: 1967
Wage gap: 1970, 57%; 1975, 63.3%; 1980, 64.7%
(average hourly earnings, industry)

The provision that employers pay women and men the same pay for like work or work of equal value is made in the Grand Ducal Regulation of 1974.

NETHERLANDS

Member state, EEC
ILO Convention No. 100 Ratification: 1971
Wage gap: 1970, 73.3%; 1975, 79.5%; 1980, 77.9%
(average hourly earnings)

The right for women and men to receive equal pay for work of equal value was established by the Law of March 20, 1975.

Under the law, workers making claims take their case to the Committee on Equal Pay, which is made up of five appointed members — two representatives of employers, two representatives of workers and one who is a Ministry official. With an opinion from the Committee, workers with claims may initiate further proceedings to settle them.

NEW ZEALAND

ILO Convention No. 100 Ratification: 1983
Wage gap: 1986, 79.4%
(average hourly earnings)

In 1972, New Zealand passed the Equal Pay Act. The Act, which covered the private sector, required employers to implement equal pay for women by determining the rate of remuneration that would be paid to male employees with the same, or substantially similar, skills, responsibility, and who performed work under the same, or substantially similar degrees of effort. The work classification exercises the Act required unions, employers and workers to undertake was intended to ensure that equal pay was implemented on the basis of equal pay for work of equal value. Implementation of equal pay through awards and agreements was to be completed by April 1977.

The Act, however, was not particularly successful in closing the wage gap, for a variety of reasons. The New Zealand Clerical Workers union took a case to the Arbitration Court in February 1986 to seek a ruling that would direct employers to negotiate for equal pay for work of equal value. The Court ruled that since all workers were required to have equal pay by 1977 according to the Equal Pay Act, the question could not be reopened.

Pressure from various equal pay for equal work campaigns by unions and other advocates resulted in a lengthy government study of equal pay. The final phase of the report, which recommends comprehensive legislation to address equal pay for work of equal value and equal employment opportunities, is now under consideration.

NORWAY

ILO Convention No. 100 Ratification: 1959
Wage gap: 1970, 75.1%; 1975, 78%; 1980, 81.9%
(average hourly earnings, manufacturing)

Section 5 of The Equal Status Act, in effect since 1979, reads, in part:

> Women and men employed by the same employer shall have equal pay for work of equal value.

An appointed Equal Status Ombud, or Commissioner, and a Board work to imple-

ment the act. Individuals or organizations with sex-discrimination complaints may apply to the Commissioner, who attempts to reach a voluntary settlement. If a settlement cannot be reached, the case may be brought before the Board.

SOVIET UNION

ILO Convention No. 100 Ratification: 1956
Wage gap: unknown

Zoya Pukhova, Chairperson of the Soviet Women's Committee:

"As for wages, women get equal pay for equal work. The constitutional right is unswervingly observed in the USSR. But ... in industry, agriculture and construction a large number of women are still doing unskilled jobs. Thus, in mechanical engineering and metal working 70 percent of women are at the first, second and third level of competence and only 1.3 per cent have attained the highest level — the sixth. In the past five years in the country as a whole the number of women achieving higher levels declined by 1.5 per cent."

SWEDEN

ILO Convention No. 100 Ratification: 1962
Wage gap: 1985, 91%
(average monthly earnings, industry)

The Act on Equality Between Men and Women at Work entered into force in 1980. The law, which applies to both public and private sectors, does not specifically require equal pay for work of equal value. It prohibits sex discrimination and obligates employers to affirmatively promote equality. Many sources, however, indicate that equal pay for work of equal value has long been accepted in Sweden, and the narrow wage gap suggests that it is practiced more effectively than elsewhere.

Two new national authorities, the Equal Opportunities Ombudsman and the Equal Employment Opportunity Commission, were empowered simultaneously with the Act. Along with labor organizations, who work to promote complementarity of the Act's measures with collective bargaining agreements, the authorities work to implement the Act.

The narrow wage gap may also be attributed to Swedish unions' practice of negotiating the largest wage increases for the lowest-paid workers, a policy that would affect women workers.

UNITED KINGDOM

Member State, EEC
ILO Convention No. 100 Ratification: 1971
Wage gap: 1975, 72.1%; 1985, 74%
(average hourly earnings)

The Equal Pay Act, which was passed in 1970 and implemented in 1975, was strengthened by The Equal Pay for Work of Equal Value Amendment, enacted in 1983. Under the amendment, it is unlawful for an employer to pay a woman less than a man doing a job of equal value "where a woman is employed on work which is in terms of the demands made on her (for instance under such headings as effort, skill and decision), of equal value to that of a man in the same employment," the legislation reads.

Women can also pursue a claim if it can be demonstrated that using an existing job evaluation system is discriminatory.

To pursue an equal pay claim, woman must fill in a form that is then sent to an industrial tribunal, which determines if a case can be made. If a case appears to be valid, the tribunal will commission an independent expert, who will assess whether or not the work is of equal value. The experts are part of the Advisory, Conciliation and Arbitration Services (ACAS), a government advisory service. The tribunal can accept or reject the expert's assessment.

When the Equal Pay Act came into effect in 1975, initial enthusiasm brought 1,742 claim applications. By 1982, the number of applications had fallen to 39. In 1984, when the amendment including equal pay for work of equal value was enacted, applications went up to 70, an increase some speculated could be attributed to the amendment.

Case law on equal pay for work of equal value is slowly being established as cases wind their way through the tribunals. Cases have taken up to 18 months to conclude.

In bargaining, unions have been successful in making equal pay gains for workers in all sectors. Negotiations have included the elimination of the lowest pay grades; flat rate increases; and establishing a minimum earnings level to work toward pay equity.

Public sector unions such as the National Union of Public Employees are seeking new job evaluations and revisions of national grading systems to make gains for women workers, such as nurses, using equal value.

UNITED STATES

Wage gap:	**1977**	**58.9%**
	1978	**59.4%**
	1979	**59.7%**
	1980	**60.2%**
	1981	**59.2%**
	1984	**63.7%**
	1985	**64.6%**
	1986	**64.3%**
	1987	**65 %**

(median annual earnings)

While the United States does not have federal legislation specifically requiring equal pay for work of equal value, the Supreme Court has affirmed since 1981 that Title VII of the Civil Rights Act of 1964 goes beyond the Equal Pay Act of 1963 to prohibit discrimination in the same jobs and in jobs that are different.

Increasingly, pay equity is achieved in the U.S. through voluntary efforts, such as collective bargaining or legislation. In the past five years, the National Committee on Pay Equity has documented a steady increase in equal pay for work of equal value, or pay equity, activity in the public sector at state and local government levels. Currently, 22 states and the District of Columbia have conducted pay equity studies of state civil service workers, and 20 states have made pay equity adjustments for state civil service workers.

Some private sector employers, voluntarily or through negotiations, are also developing pay equity plans for their workforces.

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About the National Committee on Pay Equity

The National Committee on Pay Equity (NCPE) is the national coalition of labor, civil rights and women's organizations, religious, professional and legal associations, state and local government agencies and individuals working to end sex- and race-based wage discrimination and to achieve pay equity in the United States.

From its headquarters in the nation's capital, the National Committee on Pay Equity serves as a central clearinghouse for information on pay equity activities and provides leadership, coordination, information, technical assistance and strategy direction to pay equity advocates, public officials, the media and others interested in pay equity.

Founded in 1979, NCPE is a non-profit organization supported by dues, special contributions from members and grants.

For more information, contact the **National Committee on Pay Equity at 1201 Sixteenth Street, N.W., Suite 420, Washington, DC 20036, U.S.A., or call 202/822-7304.**

Additional copies of *Closing the Wage Gap: An International Perspective* may be ordered for $1 (NCPE members), $2 (non-members). All orders must be prepaid. For orders outside the U.S. and Canada, please include an additional 15 percent to compensate for the rate of exchange and air mail postage costs. Thank you.

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National Committee on Pay Equity

Closing the Wage Gap

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National Committee on Pay Equity
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